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March 29, 2019

Magistrate Judge Steven C. Mannion
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Kenneth Chang a/k/a Kan Zhang v. The Bank of New York Mellon Corp., et al.

Civ. Action No.: 2:17-cv-11061

Status Letter

Dear Judge Mannion:

This Firm represents Kenneth Chang a/k/a Kan Zhang ("Plaintiff") in the above entitled action. During the last telephone conference, Your Honor set deadlines on how the action is to proceed. These included deadlines for notices of deposition to be sent out and when the depositions are to be finished. Plaintiff requests an extension of those deadlines because this Firm needs additional time to review the ESI production of over 100,000 documents. While this is a small firm and cannot dedicate all resources solely to this action, we reviewed approximately a fourth of the production. Plaintiff needs more time-at least a month-before notices for deposition can be sent out. This Firm spoke to counsel for Defendants who consents for an extension of time. If the Court wishes to set up another telephone conference, please let this Firm know.

Thank you for your attention to this matter.

Deadline is
extended 30
days. Fact deposition
discovery is also extended 30 days.
SO ORDERED

For Plaintiff:
/s/ Antony Lembersky
Antony Lembersky

s/Steven C. Mannion *SM*
Steven C. Mannion, U.S.M.J.

Date: 4/1/19